

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,
SMARTMATIC INTERNATIONAL
HOLDING B.V., and SGO
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY
PILLOW, INC.,

Defendants.

Case No. 22-cv-0098-JMB-JFD

**DECLARATION OF JULIE M. LOFTUS IN SUPPORT OF SMARTMATIC'S
SECOND MOTION TO SHOW CAUSE**

I, Julie M. Loftus, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over the age of 18, I am competent to make this declaration, and I have personal knowledge of the facts stated herein. These facts are true to the best of my knowledge, information, and belief, and if called upon to testify as a witness, I could and would testify competently to them.

2. I am an attorney at the law firm Benesch, Friedlander, Coplan & Aronoff, LLP, and I represent Plaintiffs Smartmatic USA Corp., Smartmatic International Holding B.V., and SGO Corporation Limited ("Smartmatic") in the above-captioned lawsuit.

3. Attached as Exhibit A is a true and correct copy of Plaintiffs' Amended Interrogatory No. 14 Directed at Defendants Michael J. Lindell and My Pillow, Inc.

4. Attached as Exhibit B is a true and correct copy of a September 24, 2024 email from me to counsel for Defendants Michael J. Lindell and My Pillow, Inc. (“Defendants”), Christopher Kachouroff.

5. Attached as Exhibit C is a true and correct copy of a September 26, 2024 email from me to Mr. Kachouroff.

6. Attached as Exhibit D is a true and correct copy of an October 10, 2024 email from me to Mr. Kachouroff.

7. Attached as Exhibit E is a true and correct copy of an email exchange between me and Mr. Kachouroff dated October 17, 2024.

8. Attached as Exhibit F is a true and correct copy of Plaintiffs’ Second Set of Interrogatories Directed at Defendant My Pillow, Inc.

9. Attached as Exhibit G is a true and correct copy of Plaintiffs’ Fifth Set of Requests for Production Directed at Defendants Michael J. Lindell and My Pillow, Inc.

10. Attached as Exhibit H is a true and correct copy of a September 20, 2023 email from James Bedell to former counsel for Defendants.

11. Attached as Exhibit I is a true and correct copy of Plaintiffs’ First Set of Interrogatories Directed at Defendants Michael J. Lindell and My Pillow, Inc.

12. To date, Defendants have not served any written responses to Smartmatic’s Fifth Set of Requests for Production and Fourth Set of Interrogatories.

13. To date, Defendants have not produced any documents responsive to Smartmatic’s Fifth Set of Requests for Production or Fourth Set of Interrogatories.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.



Julie M. Loftus

Executed on December 9, 2024.